



State of New Jersey

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Alison A. Hess, C.P.G.
Project Manager
USEPA Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

June 10, 2014

Re: Standard Chlorine Chemical Company (SCCC) Site
1015 to 1035 Belleville Turnpike
Town of Kearny, Hudson County
SRP PI# G000001583
Activity Number Reference: RPC000001

Dear Ms. Hess:

The New Jersey Department of Environmental Protection (NJDEP) has completed its review of the April 2014 Monthly Progress Report. The NJDEP reviewed the above mentioned document in accordance with its guidance and policies, and provides the following comments and/or recommendations for your consideration.

Comments

1. Information provided in the report continues to indicate the hydraulic control treatment system (HCTS) has not attained the goal of an inward gradient across the barrier wall designed to contain site contamination. Irrespective of total precipitation, the negative inward gradient (i.e., outward gradient) has not improved much in two years (see Figure 1). Total precipitation should not factor into the equation as the system is supposed to be designed to contend with it.
2. In Section 2.1, the last bullet states that "passive Dense Non-Aqueous Phase Liquid (DNAPL) recovery will continue using the 5 feet minimum threshold of accumulated DNAPL for conducting recovery." As a result, besides DRWL-11, none of the other DNAPL recovery wells had any DNAPL removed at all throughout the entire quarter. Table 2 shows DNAPL well gauging data. At least 6 of the wells had consistently measurable amounts of DNAPL. DRWL-5, for example, had a measured product thickness of 4.72 feet in February 2014.

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If you have any questions regarding this matter, you may contact me at (609) 633-1448.

Sincerely,



Jay Nickerson
Bureau of Case Management, Site Remediation Program
New Jersey Department of Environmental Protection

cc. Jay Nickerson, BCM, NJDEP
Steve Byrnes, BEERA, NJDEP
David Van Eck, BGWPA, NJDEP